

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

**THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,
as representative of
THE COMMONWEALTH OF PUERTO RICO, et al.,
Debtors¹**

**PROMESA
TITLE III
Case No. 17-BK-3283
(LTS)**

**URGENT MOTION REQUESTING RELIEF REGARDING THE VOTING PROCESSES
AND TO REMEDY ERRORS IN THE SOLICITATION PACKAGES AND
ALTERNATIVE REMEDIES AND FOR AN ORDER TO EXTEND VOTING DEADLINE
FOR GROUP WAGE CLAIMANTS INCLUDED IN CLASS 58 FOR 21 DAYS**

To the Honorable United States District Court Judge Laura Taylor Swain:

NOW COMES the group wage creditors, as active or former government employees, in the litigation captioned: (1) Nilda Agosto Maldonado et als v Family Department et als case no. K PE 2005-0608, (728 claimants) (2) Carmen Socorro Cruz Hernandez et als. case No. K AC 1991-0665 (334 claimants) (3) Juan Perez Colon et al. v. Puerto Rico Department of Transportation & Public Works, Case No. KAC1990- 0487 (the "Perez Colon, Master Claim No. 30851") (324 Claimants); (4) Jeanette Abrams Diaz et al. v. Department of Transportation & Public Works, Case No. KAC-2005-5021 (the "Abrams Diaz Master Claim No. 50221" (1,084 Claimants));(5) in the consolidated

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566- LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

judgment entered by the CFI Aguadilla, dated April 22, 2016 in case of Norberto Tomassini and Ivan Ayala, Case No. A MI 2003-0243 and A PE 2005-0049 (86 claimants); (6) Madeline Acevedo-Camacho v Family Department, ARV and NAJ, Case No. 2016-05-1340 (Master Claim No. 32044),(2,818 claimants (7) Francisco Beltran Cintron et al. v. Puerto Rico Department of Family Affairs, (Case No. KAC-2009-0809/ CASP No. 2021-05-0345 (the "Beltran Cintron, amended Master Claim No. 179140")(4,493 Claimants); (8) Abraham Gimenez et al. v. Puerto Rico Department of Transportation & Public Works, Case No. KAC-2013- 1019 I CASP No. 2021- 05-0346 (the "Abraham Gimenez, amended Master Claims no.179141 ")(1,046 claimants); (9) Alejo Cruz Santos et al. v. Puerto Rico Department of Transportation & Public Works, Case No. RET-2002-06-1493 (the "Cruz Santos, Master Claim No. 29642")(262 Claimants);(10) Delfina Lopez Rosario et al. v. Puerto Rico Police Department, Case No. 2001-10-372 (the "Lopez Rosario, Master Claims no. 15708")(1,345 Claimants ; (11) Prudencio Acevedo Arocho et al. v. Puerto Rico Department of Treasury, Case No. KAC-2005-5022 (the "Acevedo Arocho, Master Claims no. 51013") (1,379 claimants); **through** the undersigned attorney and respectfully states and prays:

i. PRELIMINARY STATEMENT

1. The current voting deadline is Monday, October 4, 2021 at 5 p.m. AST.
2. The appearing Group wage creditors, are active or former government Employees, that have been classified in class 58, as general unsecured creditors, and have not been timely provided "solicitation" packages with ballots or Notices of voting and election instructions, much less instructions applicable to their wage claims, as ahead will be explained in more detail. Specifically, because was not until September 29 and

October 1, 2021 that the subscribing attorney, received the “solicitation” packages and ballots for appearing creditors, with significant errors or problems.

3. Although this Court’s order required “solicitation packages” with ballots or notices with instructions for voting and/or election to be mailed by August 30, 2021 it has become apparent that there have been delays in the process of mailing “solicitation” packages.² For example:

(a). On September 23, the Official Committee of Retired Employees and the UCC filed motions, for classes they represent, to extend the voting deadline for Holders of Claims in Classes 51 B, 51 D, 51 E, 51 F, AND 51 L, citing problems affecting members of their classes with timely receipt of solicitation packages.³

On September 27, 2021, the Court entered an Order (ECF No. 18258, the “Voting Deadline Extension Order”) granting the Motion of the Official Committee of Retired Employees and Modifying certain Deadlines in solicitation Procedure Order and extent deadline for fourteen (14) days and, to include October 18, 2021 at 5:00 Pm (Atlantic time). However, that extended the Voting Deadline, did not extend the Election Deadline. It provides that “[a]ll other deadlines in the Solicitation Procedures Order . . . shall remain in full force and effect, and shall not be affected by this order.” See *id.* ¶ 5. It therefore appears that the Election Deadline remains October 4, while the Voting Deadline has been extended to October 18 for Classes 51 B, 51 D, 51 E, 51 F, and 51 L.

(b) . Also, and although this Court’s order provided that creditors were to receive “the appropriate form of the “Notice of Voting and Election Instructions”⁴ to remedy

² See Docket No. 17639 at page-4-¶-D, page-8-¶11, and page-10-¶13),

³ See, Docket No. 18214, No.18215, and No.18228.

⁴ See Docket No. 17639-page-10, ¶13 and page-17-to-18

problems in the solicitation packages and processes, by Motion filed by Peter C. Hein (the "Movant"), on September 30, 2021, this Court entered another Order, Scheduling Briefing of Motions of Individual Bondholders for an Order Further Extending the Voting Deadline for retail Investors for seven days and for Additional Relief (See Docket Entry No. 18305 and No 18306 and Docket 18312).

4. Movants herein submits, that it was not until September 29, 2021 that the subscribing attorney received a what purported to be a "solicitation" package mailing with respect to group wage claimants relating to creditors of the case of Nilda Agosto Maldonado and which included a version of the flash drive and instructions for as to how to deliver or vote.

5. Also, and in reference to the group Employees Claimants with final judgments in their favor, and that are included in the group claims of: Juan Perez Colon, et als,; Jeanette Abrams Diaz, and in the Consolidated April 22, 2016 judgment in the litigation cases of Tomassini, Norberto and Ivan Ayala, Case No. A MI 2003-0243 and A PE 2005-00499, although collectively, the group is composed of fourteen hundred ninety four (1,494) active or former employees claimants, the Oversight Board did not provided individual "solicitation" packages with ballots and notices of voting and election instructions.

6. Instead, notified **only three ballots**⁵. **One for each group claim**, although in the respective Proof of Claims filed, each claimant is identified separately, by their names and the back pay owed to the individual claimant This notice was also received on September 30, 2021.

⁵ See Exhibit 1

7. Similarly, in regards the following group wage claims:

- Madeline Acevedo-Camacho v Family Department, ARV and NAJ, Case No. 2016-05-1340 (Master Claim No. 32044),
- Francisco Beltran Cintron et al. v. Puerto Rico Department of Family Affairs, Case No. KAC-2009-0809/ GASP No. 2021-05-0345 (the "Beltran Cintron, amended Master Claim No. 179140");
- Abraham Gimenez et al. v. Puerto Rico Department of Transportation & Public Works, Case No. KAC-2013- 1019 I CASP No. 2021- 05-0346 (the "Abraham Gimenez, amended Master Claims no.179141 " (1,046 claimants);
- Alejo Cruz Santos et al. v. Puerto Rico Department of Transportation & Public Works, Case No. RET-2002-06-1493 (the "Cruz Santos, Master Claim No. 29642"); (262 claimants)
- Delfina Lopez Rosario et al. v. Puerto Rico Police Department, Case No. 2001-10-372 (the "Lopez Rosario, Master Claims no. 15708"); and
- Prudencio Acevedo Arocho et. als V Puerto Rico Department of Treasury, case No. KAC-2005-5022 (the "Acevedo Arocho, Master Claims no. 51013");

was not until September 30, that the subscribing attorney received a single solicitation package and ballot, for identified group claims . However, upon a simple examination of the ballots was verified, that the Claim's value registered in the ballot, was improperly modified inconsistent with 11 U.S.C. section 1126, by assigning each of the referenced group claims, one (\$1.00) dollar value.⁶

II. ARGUMENT:

A. The Group Wage Creditors included in the master claims No. 32044; the amended Master Claim No. 179140"; amended Master Claims no.179141; Master Claim No. 29642"; Master Claims no. 15708; and Master Claims no. 51013, **as active and former government employees, are entitle to a clarification as to why their claims, for wages and salaries has not been excluded from class 58 and voting procedures and transferred to the ARC procedures**

1. Movants submits that they have been erroneously Included by Oversight Board in Class 58, and in the voting process to circumvent dissenting creditor's rights,,since their claims are for wages and salaries. Therefore, by including the group

⁶ SEE EXHIBIT

wage claims, as general unsecured in class 58, the Oversight Board is using the voting procedure to bypass ARTICLE LXXXII of the Proposed Plan, to avoid the transfer of the identified employees claims to the ACR procedures and payment of the correct base salaries mandated by law.

2. Also, because by improperly modifying inconsistent with 11 U.S.C. section 1126, and registering in the ballot, the group wage Claims included in the master claims No. 32044; the amended Master Claim No. 179140"; amended Master Claims no.179141; Master Claim No. 29642"; Master Claims no. 15708; and Master Claims no. 51013, and assigning one (\$1.00) dollar value to each of the referenced group claims, constitutes another example of how the Debtor pretends to manipulate the voting and outcome of the confirmation procedures.⁷

3. This, although the Oversight Board, in multiple documents filed before this Court have recognized the face value of the individual Group Proof of Claims filed , and which collectively, have an estimated value of \$247,000,000.00.⁸

4. Due to above inconsistencies, Claimants submits that is imperative a Clarification, as to the transfer Movants claims to the ACR procedures, since is critical to guarantee claimant's due Process and the transparency of the voting procedures.

B. In the alternative, and a final determination is made regarding the classification of the Group Wage Creditors in class 58, then and because group claimants have not received timely notification of the "solicitation " pages with Ballots or notices of voting and election Instructions is submitted that, the voting deadline should be extended.

5. The current voting deadline is Monday, October 4, 2021, at 5 p.m. AST. and

⁷ See Exhibit 2 -A

⁸ Included in Exhibit 2 -B , examples of the Oversight Board acceptance of claim value in cases Madeline Acevedo Camacho group; Francisco Beltran group; Abraham Gimenez group

as previously informed, was not until September 29, 2021 that the subscribing attorney began receiving the solicitation packages with ballots.

6. Therefore, and considering that, not only the majority of individual creditors, in reference cases are spread throughout the different towns of the Island of Puerto Rico and island of Vieques, but also at this time, not all the ballots have arrived, if the Election Deadline were not extended, appearing creditors may be prejudiced, due to the problems and excessive delay in receiving the solicitation packages.

7. To said effect, we inform, that after a meticulous review of the voting packages received, the following claimants that belong to the Nilda Agosto Maldonado group, have not received by October 2, 2021 their ballots:

ACEVEDO ACEVEDO, SANTOS (CLAIM #17752)
ACEVEDO ROSARIO, SONIA N. (CLAIM #10447)
AFANADOR ANDUJAR, ALICE DAISY (CLAIM #10315)
AGOSTO HIDALGO, YADIRA, T/C/P AGOSTO DE DÍAZ, YADIRA (CLAIM #11295)
ALICEA GARCIA, MIGDALIA (CLAIM #10662)
ARCAY GARCIA, MARIA LUISA (CLAIM #10174)
BARRETO COSME, DAVID (CLAIM #10873)
BETANCOURT ASECIO, GLADYS (CLAIM #10739)
BRACERO RABASSA, RAFAEL (CLAIM #10890)
CINTRON DIAZ, ADELMA DEL C. (CLAIM #7271, 8947 y 10627)
CORDERO PARRILLA, MIRIAM E. (CLAIM #9330)
CRISPIN DE JESUS, EVA (CLAIM #9419)
CUEVAS GONZALEZ, ROBERT (CLAIM # 10176)
DIAZ DAVILA, SARA (CLAIM #12045)
ECHEVARRIA LAUREANO, ELIZABETH (CLAIM #10826)
ESTEVEZ ALVAREZ, CARMEN H. (CLAIM #9413)
FERNANDEZ RIVERA, RUTH (CLAIM #9449)
FRANCO LOPEZ, ELBA M. (CLAIM #11621)
GARCIA CANALES, CELIA (CLAIM #9216)
GARCIA MORALES, CINDY M. (CLAIM #10494)
GARCIA REYES, SANTOS J. (CLAIM #9980 y 10366)
GARCIA RULLAN, LETICIA (CLAIM #10649)
GASCOT SAEZ, MARIA B. (CLAIM #10181)
GOMEZ MALDONADO, MARIA M. (CLAIM #10196)
GONZALEZ ENCARNACION, LUZ D. (CLAIM #24097)
GONZALEZ MORALES, IRMA I. (CLAIM #9719)
GONZALEZ VAZQUEZ, CARMEN L. (CLAIM #10360)
HERNANDEZ MORALES, ARMANDO (CLAIM #11018)
HERNANDEZ RIOS, MYRIAM (CLAIM #146816 y 65738)
HERNANDEZ RODRIGUEZ, UBALDO (CLAIM #16320)
LOPEZ QUILES, ILEANA (CLAIM #12040)
LOPEZ SANTOS, MARIA DE LOS A. (CLAIM #9467)

MALDONADO COLON, MARGARITA (CLAIM #11100)
MARCANO FIGUEROA, WILLIAM (CLAIM #10362)
MATIAS NIEVES, LAURA E. (CLAIM #10853)
MATOS ORTIZ, SONIA E. (CLAIM #9996)
MERCADO BURGOS, GUILLERMO (CLAIM #11136)
MOJICA RIVERA, MARIA A. (CLAIM #11914)
MONTALVO LAGUNA, YOLANDA (CLAIM #14946)
MORAN ROSARIO, OLGA LUCY (CLAIM #12170)
MUNDO RODRIGUEZ, FAUSTO (CLAIM #10998)
NEGRON LOPEZ, HILDA (CLAIM #11137)
NIEVES GARCIA, ZORAIDA (CLAIM #756340)
NIEVES PEREZ, VICTOR M. (CLAIM #12150)
NORMANDIA RODRIGUEZ, MYRNA (CLAIM #12129)
ORTIZ PANIAGUA, EVELYN (CLAIM #11310)
ORTIZ VELEZ, BRENDA (CLAIM #9190)
PRADOS ESCOBAR, ROSA ALBA, T/C/P PRADOS DE LAUREANO, ROSA A. (CLAIM #11101)
ROMAN HERNANDEZ, MARIA D. (CLAIM #12765)
RAMOS PAZ, MILDRED (CLAIM #9254)
RAMOS RIOS, CARMEN (CLAIM #9338)
REYES ORTIZ, LOYDA (CLAIM #11633)
REYES RODRIGUEZ, OSVALDO (CLAIM #11293)
RIVERA CASILLAS, ELIAS (CLAIM #10611)
RIVERA DOMINGUEZ, ELIZABETH (CLAIM #10698)
RIVERA GONZALEZ, MARIA I. (CLAIM #11625)
RIVERA MARRERO, GLADYVEL (CLAIM #10499)
RIVERA MUNIZ, GLORIA (CLAIM #10185)
RIVERA PAGAN, LAURA (CLAIM #11098)
RIVERA ROBLES, ANTONIA (CLAIM #11262)
RIVERA RODRIGUEZ, CARMELO (CLAIM #9188)
RIVERA SANTIAGO, MARIA M. (CLAIM #10170)
RIVERA VEGA, WILLIAM (CLAIM #9462 y 10179)
ROBLES TORRES, LYDIA E. (CLAIM #11947)
RODRIGUEZ CRUZ, MARIA E. (CLAIM #12228)
RODRIGUEZ FIGUEROA, CARMEN S. (CLAIM #9203 y 15778)
RODRIGUEZ QUINONES, LUZ S. (CLAIM #9296)
RODRIGUEZ RODRIGUEZ, OLGA M. (CLAIM #12015)
RODRIGUEZ VALENTIN, EVELYN (CLAIM #9411)
ROSADO TORRES, MARÍA M. (CLAIM #12407)
ROSADO VELEZ, MARIA A (CLAIM #12187 y 12543)
ROSARIO CARRASQUILLO, SARA M. (CLAIM #18259 y 16316)
SANTANA GARCIA, JUANA (se radicó como Santiago García, Juana)(CLAIM #11972)
SANTIAGO QUINONES, HILDA E. (CLAIM #10188)
SANTOS ORTIZ, GISELA (CLAIM #11969)
SERRANO SERRANO, EDITH (CLAIM #12338)
SKERRET CALDERÓN, BRUNILDA (CLAIM #12737)
SUSTACHE RIVERA, VICTORIA (CLAIM #12716)
TOLEDO ROSA, JOSE G. (CLAIM #12325)
TORRES CORREA, ANGEL (CLAIM #9662)
TRICOE DE JESUS, LUZ H. (CLAIM #9201)
VALDERRAMA RODRIGUEZ, CARMEN M. (CLAIM #23093)
VARGAS ENCARNACION OLGA I. (CLAIM #12320)
VIGIL DANGER, IVO (CLAIM #11662)
VINALES HERNANDEZ, GRISELLE E. (CLAIM #10068)
VIZCARRONDO FERNANDEZ, NITZA G. (CLAIM #8489)

8. Also and because the majority of claimants are low income citizens and do

not have a computer, and having the Oversight Board, included in the notification package, a version of the flash drive – for them..said drive is useless, since need assistance. This, is another factor that justify the extending the voting deadline for appearing group claimants.

9. Consequently, the failure to provide timely and clear notice of voting and election instructions, for qualified voting creditors, the appearing claimants will be highly prejudiced if the voting deadline is not extended. Particularly, when is considered, that the notices of voting and Election Instructions, were received with only five or four calendar days, before the voting deadline, and even using our best efforts, the majority of group wage creditors will not have the opportunity to make an election, until after the current October 4, voting deadlines., which raises a serious due process issue.

10. However, the extension of the voting deadline will not prejudice the Debtor, since will have no impact on the timing of plan confirmation, because the elections will not affect the voting process (and indeed would be completed on the same timetable). But if the Election Deadline were not extended, to appearing creditors and whom are required to make an election, may be prejudiced.

11. In addition, because we have find serious irregularities in the notifications and in the voting process that need to be corrected to guarantee claimants due process.

. For example, is the issue of the defective ballots, since as previously indicated, in the litigation cases of Juan Perez Colon **et als**,; **Jeanette Abrams Diaz**, and in the **Consolidated April 22, 2016 judgment in the litigation cases of Tomassini, Norberto and Ivan Ayala**, Case No. A MI 2003-0243 and A PE 2005-00499, although collectively, the group is composed of fourteen hundred ninety four (1,494) active or former

employees claimants, the Oversight Board did not provided individual "solicitation" packages with ballots and notices of voting and election instructions. Instead only notified three ballots.⁹

12. Therefore, in order to provide these claimants an adequate remedy, the Court must Order the Oversight Board to notify individual ballot, after the current Election Deadline of October 4. 2021 , in order to provide these claimants opportunity to vote and make an election.

13. In reference to the following group wage claims, Movants submits:

- Madeline Acevedo-Camacho v Family Department, ARV and NAJ, Case No. 2016-05-1340 (Master Claim No. 32044),
- Francisco Beltran Cintron et al. v. Puerto Rico Department of Family Affairs, Case No. KAC-2009-0809/ GASP No. 2021-05-0345 (the "Beltran Cintron, amended Master Claim No. 179140");
- Abraham Gimenez et al. v. Puerto Rico Department of Transportation & Public Works, Case No. KAC-2013- 1019 I CASP No. 2021- 05-0346 (the "Abraham Gimenez, amended Master Claims no.179141 " (1,046 claimants);
- Alejo Cruz Santos et al. v. Puerto Rico Department of Transportation & Public Works, Case No. RET-2002-06-1493 (the "Cruz Santos, Master Claim No. 29642"); (262 claimants)
- Delfina Lopez Rosario et al. v. Puerto Rico Police Department, Case No. 2001-10-372 (the "Lopez Rosario, Master Claims no. 15708"); and
- Prudencio Acevedo Arocho et. als V Puerto Rico Department of Treasury, case No. KAC-2005-5022 (the "Acevedo Arocho, Master Claims no. 51013");

that since, was not until September 30, that the subscribing attorney received the solicitation package and ballots of reference groups and upon an examination of the ballots can notably and easy be determined that the Claim's value registered in the ballot, was improperly modified inconsistent with 11 U.S.C. section 1126, by assigning each of the referenced group claims, one (\$1.00) dollar value, in a clear act of bad faith, and due process violation. Particularly, because, in addition of closing the door to

⁹ See Exhibit 1.

participate in the ACR process, if the claim value is not corrected, claimants could forever lose any opportunity of obtaining redress for Debtor's illegal wage practices.

III PRIOR NOTICE

Regarding the above mention matters, **Claimants hereby certifies** that prior to filing the instant Motion, pursuant to the ***Fifteenth Amended Notice, Case Management and Administrative Procedures*** (ECF No. 17127-1, the subscribing attorney made good-faith communications and conferred with Debtor attorneys telephonically to seek agreement to extend the voting deadline for wage Creditors at least three weeks and until October 25, 2021, in order to remedy the problems in the solicitation packages and processes, but their response was limited to grand the extension, until October 18, 2021, which we consider is not adequate, in view of the number of claimants and irregularities in the process above described, since the issue of defective ballots and notification notices has to be resolved.

IV. RESERVATION OF RIGHTS

29. Notwithstanding the foregoing, Movants expressly reserves all (and does not hereby waive any of its (a) rights, claims, counterclaims, defenses, interests, actions and remedies concerning to (i) the right to resolution of all issues implicated in relation to pending Sections 503 (b)(1)A (i)(ii) and 507 Motions, relating to the payment of administrative expense claims (docket No.17134; 18239; 18277; and 18282), including without limitation the (A) right to a judicial determination of the amount(s) due and owing with regard to any priority claim, (B) the right to be excluded from class 58 and to said effect, Movants reserve and preserve all objections previously filed, (C) the right to adopt any other pleadings filed by any other party related to Movant's claims or this Motion

(collectively, the "Reservation of Rights") (D)

V. CONCLUSION AND RELIEF REQUESTED

The Group Wage Creditors are entitled to be informed whether their claims qualify to be transferred to the ACR procedure. Also, whether the cases with final judgement should be excluded from the voting procedures, since qualify for section 503 (b) (1)(A) (i) and (ii) priority expenses and therefore, said claims remains unclassified and be excluded from Class 58 and voting process.

.In the alternative, and if their claims will remained classified in class 58, at least, they are entitled to the same extension the Retiree Committee and UCC were granted, for the classes those committees represent.

This Court should grant this Motion for an order extending the voting deadline for Wage creditors voting deadline to at least until October 25, 2021 and Order to correct informed irregularities in the voting procedures.

The Group Wage Creditors are proposing a voting deadline extension to at least October 25, 2021 for the claimants included in the cases of Nilda Agosto Maldonado and Carmen Socorro Cruz Hernandez, because the extraordinary delays in the notification of ballots and to provide the Oversight Board an opportunity to correct deficiencies informed, which could possibly require to extend the voting deadline in regards the affected claimants.

WHEREFORE, the Movants respectfully pray for this Honorable Court to grant this Motion in order to determine whether Group Wage claimants were correctly included in Class 58 and shall be excluded from the voting procedures. In the alternative, enter an Order to remedy the delay problems in the solicitation packages and errors in the

processes and modify the following deadlines in the Solicitation Procedures Order as follows:

1. Debtor must, clarify , on or before October 19, 2021 ,(a) being the claims presented by the Group wage Claimants, as active and former government employees, for wages and salaries the reasons , as to why the group wage Claims are included in Class 58 and do not qualify, in accordance with the terms and provisions of the ACR Order, and with Article LXXXII of the Proposed Plan, to be transferred to the ACR procedures, and therefore, be excluded from the present voting process.and (b) the application of section 503 (b) (1) (A) (i) and (ii) priority in regards . Master Claim No. 30851" 30851 and 50221' and in regards Nilda Agosto Maldonado , case no. K PE 2005-0608,and Carmen Socorro Cruz Hernandez et als. case No. K AC 1991-0665 the reason why they should not be excluded from the voting process, and class 58.
2. In the Alternative, if this Court determines that Group claimants are correctly included in Class 58, the Election Deadline for the Group wage Creditors included in the judgment entered in the cases of Nilda Agosto Maldonado and Carmen Socorro Cruz Hernandez the voting deadline shall be extended to and including October 25, 2021 at 5:00 PM (Atlantic Standard Time),
3. In regards to the group claims in Juan Perez Colon, Jeanette Abrams Diaz and in consolidated judgment entered April 22, 2016 in the cases of **Tomassini, Norberto and Ivan Ayala**, Case No. A MI 2003-0243 and A PE 2005-00499, and regarding the outstanding ballots not yet received identified in paragraph _____, the Debtor must notify individual Ballots and Election Deadline for mentioned Group Wage Creditors ,shall be extended 21 days, from the date of receiving the individual ballots at 5:00 PM (Atlantic Standard Time),
4. In regards the Group wage Claims included in the master claims No. 32044; the amended Master Claim No. 179140"; amended Master Claims no.179141; Master Claim No. 29642"; Master Claims no. 15708; and Master Claims no. 51013, Debtor must re-submit solicitation packed an ballot with the correct value amount stated in the respective proof of claims. The Election Deadline for mentioned Group wage Claims ,shall be extended 10 days from the date of receiving the individual ballots at 5:00 PM (Atlantic Standard Time),
5. All other deadlines in the Solicitation Procedures Order, as modified by the Voting Deadline Extension Order, shall remain in full force and effect, and shall not be affected by this proposed order.
6. And grant any other relief that is just and proper.

V. NOTICE OF TIME TO RESPOND

Pursuant to the terms set forth in the Court's Fifteenth Amended Notice, Case Management and Administrative Procedures Order [ECF 15894-1] the following terms shall apply about the present Motion:

a. The Government Parties will file any objection to the Motion (on an individual or joint basis), concerning the request for the Standing issue, no later than October 19, 2021;

b. The Group Wage Claimant's Parties will file their Response in support of the Motion, concerning the Standing Issue, no later than October 27, 2021;

c. The Government Parties will file a reply (on an individual or joint basis) to the Group Wage 's Response by no later than November 3, 2021;

d. Further take notice that, after the Objection deadline has passed, and no Objection had been filed or served in accordance with the set procedures set forth herein, counsel to the entity that has filed the request for relief may file a CNO indicating that no Objection has been filed or served on the party who has filed the request for relief and submit an order granting the relief requested and in the alternative,

e. The Court will hear argument on the Motion, solely concerning the Standing Issue, at a date and location to be determined by the Court.

I HEREBY CERTIFY, in accordance with Fed. R. Bankr. P. 9014(b), Fed. R. Bankr. P. 7004(b), and the Court's Fifteen Amended Notice, Case Management and Administrative Procedures Order [ECF 15894-1] (the "CMP Order"), that we electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, which will send

notification of such filing to all CM/ECF participants in this case. I further certify that, on this same date, I served the foregoing upon all the Standard Parties as identified and defined in the Court's CMP Order, as well as upon all of the parties identified in the Master Service List maintained at <https://cases.primeclerk.com/puertorico/>.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 4 th day of October 2021.

ATTORNEY FOR THE GROUP WAGE CREDITORS

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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

**THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,
as representative of
THE COMMONWEALTH OF PUERTO RICO, et al.,
Debtors¹⁰**

**PROMESA
TITLE III
Case No. 17-BK-3283
(LTS)**

**[PROPOSED] ORDER SCHEDULING BRIEFING OF MOTION OF INDIVIDUAL
GROUP WAGE CLAIMANTS FOR AN ORDER FURTHER EXTENDING THE VOTING
DEADLINE FOR 21 DAYS AND UNTIL OCTOBER 25, AND PROVIDING
ADDITIONAL RELIEF TO REMEDY PROBLEMS IN THE SOLICITATION PACKAGES
AND PROCESSES**

The Court has received and reviewed the Motion of Individual Group Wage Creditors for an Order Further Extending the Voting Deadline for 21 Days and for Additional Relief to Remedy Problems in the Solicitation Packages and Processes (Docket Entry No. ----- - in Case No. 17-3283, the "Motion") filed by Group Wage Creditors (the "Movants").

Debtor's Response to the Motion must be filed by October 2021, at 5:00 p.m. (Atlantic Standard Time).

Movant's reply papers must be filed by October 2021, at 5:00 p.m. (Atlantic Standard Time).

The Court will thereafter take the Motion on submission, unless the Court determines that a hearing is necessary.

Dated: _____, 2021

**HONORABLE LAURA TAILOR SWAIN
UNITED STATES BANKRUPTCY JUDGE**

¹⁰ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

EXHIBIT 1

Commonwealth of Puerto Rico 1845 SRF 55668 MMLID 1421054 PackID 58-0928
Juan Pérez-Colón et al (324 Plaintiffs) collectively (the "Pérez-Colón Plaintiff Group") Civil Case
Lcda. Ivonne González-Morales
PO Box 9021828
San Juan PR 00902-1828



PLEASE COMPLETE THE FOLLOWING:

Item 1. Amount of Claim

For purposes of voting to accept or reject the Plan, the undersigned holds the Claim(s) in **Class 58 (CW General Unsecured Claims)** as of the July 13, 2021 Voting Record Date as set forth below in the following aggregate amount:

\$2,435,987.21

To submit your election in Item 2 and vote in Item 3 below via the “E-Ballot” platform, please visit <https://cases.primeclerk.com/puertorico>. Click on the “Submit E-Ballot” section of the website and follow the instructions to submit your ballot.

IMPORTANT NOTE: You will need the following information to retrieve and submit your customized electronic Ballot:

Unique E-Ballot ID#: 170328300179284

Prime Clerk’s “E-Ballot” platform is the sole manner in which elections and votes will be accepted via electronic or online transmission. Elections submitted by facsimile, email or other means of electronic transmission will not be counted.

Each E-Ballot ID# is to be used solely for voting only those Claims described in Item 1 of your electronic Ballot. Please complete and submit an E-Ballot for each E-Ballot ID# you receive, as applicable.

Creditors who make an election or vote using Prime Clerk’s “E-Ballot” platform should NOT also submit a paper Ballot.

Item 2. Election to be Treated as Convenience Claim (Class 68).

Pursuant to the Plan, any holder of an Allowed **CW General Unsecured Claim** may elect to (a) reduce the amount of such Allowed Claim to \$20,000.00 and (b) have such reduced Claim be treated pursuant to Class 68 (Convenience Claims), receiving a projected recovery of 100% of such reduced claim.

Any holder of multiple Allowed CW General Unsecured Claims and ERS General Unsecured Claims may elect to (a) reduce the amount of such multiple Claims to an aggregate amount of \$40,000.00 and (b) have such reduced claims be treated pursuant to Class 68 (Convenience Claims), receiving a projected recovery of 100% of such reduced claim. If you hold multiple Allowed CW General Unsecured Claims and ERS General Unsecured Claims, receive more than one ballot, and wish to make this election, you **must** make a consistent election on all the ballots you received for them to be treated pursuant to Class 68 (Convenience Claims). If the ballots do

Commonwealth of Puerto Rico 1845 SRF 55668 MMLID 1418513 PackID 58-1839
Jeanette Abraham Diaz et al (1,084 Plaintiffs) collectively (the "Abraham Diaz Plaintiff Group") Civ
PO BOX 9021828
San Juan PR 00902-1828



PLEASE COMPLETE THE FOLLOWING:

Item 1. Amount of Claim

For purposes of voting to accept or reject the Plan, the undersigned holds the Claim(s) in **Class 58 (CW General Unsecured Claims)** as of the July 13, 2021 Voting Record Date as set forth below in the following aggregate amount:

\$ 43,400,081.58

To submit your election in Item 2 and vote in Item 3 below via the “E-Ballot” platform, please visit <https://cases.primeclerk.com/puertorico>. Click on the “Submit E-Ballot” section of the website and follow the instructions to submit your ballot.

IMPORTANT NOTE: You will need the following information to retrieve and submit your customized electronic Ballot:

Unique E-Ballot ID#: 170328300180239

Prime Clerk’s “E-Ballot” platform is the sole manner in which elections and votes will be accepted via electronic or online transmission. Elections submitted by facsimile, email or other means of electronic transmission will not be counted.

Each E-Ballot ID# is to be used solely for voting only those Claims described in Item 1 of your electronic Ballot. Please complete and submit an E-Ballot for each E-Ballot ID# you receive, as applicable.

Creditors who make an election or vote using Prime Clerk’s “E-Ballot” platform should NOT also submit a paper Ballot.

Item 2. Election to be Treated as Convenience Claim (Class 68).

Pursuant to the Plan, any holder of an Allowed **CW General Unsecured Claim** may elect to (a) reduce the amount of such Allowed Claim to \$20,000.00 and (b) have such reduced Claim be treated pursuant to Class 68 (Convenience Claims), receiving a projected recovery of 100% of such reduced claim.

Any holder of multiple Allowed CW General Unsecured Claims and ERS General Unsecured Claims may elect to (a) reduce the amount of such multiple Claims to an aggregate amount of \$40,000.00 and (b) have such reduced claims be treated pursuant to Class 68 (Convenience Claims), receiving a projected recovery of 100% of such reduced claim. If you hold multiple Allowed CW General Unsecured Claims and ERS General Unsecured Claims, receive more than one ballot, and wish to make this election, you **must** make a consistent election on all the ballots you received for them to be treated pursuant to Class 68 (Convenience Claims). If the ballots do

Commonwealth of Puerto Rico 1845 SRF 55668 MMLID 1476645 PackID 58-1824
TOMASSINI, NORBERTO ET AL AND AYALA, IVAN ET AL, PLAINTIFF CREDITORS OF
CONSOLIDATED JUDGMENT ENTERE
NORBERTO TOMASSINI ET AL (58 PLAINTIFFS)
VAN AYALA ET AL (28 PLAINTIFFS)
ATTN. IVONNE GONZALEZ MORALES
PO BOX 9021828
SAN JUAN PR 00902-1828

PLEASE COMPLETE THE FOLLOWING:

Item 1. Amount of Claim

For purposes of voting to accept or reject the Plan, the undersigned holds the Claim(s) in **Class 58 (CW General Unsecured Claims)** as of the July 13, 2021 Voting Record Date as set forth below in the following aggregate amount:

\$ 4,909,667.10

To submit your election in Item 2 and vote in Item 3 below via the “E-Ballot” platform, please visit <https://cases.primeclerk.com/puertorico>. Click on the “Submit E-Ballot” section of the website and follow the instructions to submit your ballot.

IMPORTANT NOTE: You will need the following information to retrieve and submit your customized electronic Ballot:

Unique E-Ballot ID#: 170328300180224

Prime Clerk’s “E-Ballot” platform is the sole manner in which elections and votes will be accepted via electronic or online transmission. Elections submitted by facsimile, email or other means of electronic transmission will not be counted.

Each E-Ballot ID# is to be used solely for voting only those Claims described in Item 1 of your electronic Ballot. Please complete and submit an E-Ballot for each E-Ballot ID# you receive, as applicable.

Creditors who make an election or vote using Prime Clerk’s “E-Ballot” platform should NOT also submit a paper Ballot.

Item 2. Election to be Treated as Convenience Claim (Class 68).

Pursuant to the Plan, any holder of an Allowed **CW General Unsecured Claim** may elect to (a) reduce the amount of such Allowed Claim to \$20,000.00 and (b) have such reduced Claim be treated pursuant to Class 68 (Convenience Claims), receiving a projected recovery of 100% of such reduced claim.

Any holder of multiple Allowed CW General Unsecured Claims and ERS General Unsecured Claims may elect to (a) reduce the amount of such multiple Claims to an aggregate amount of \$40,000.00 and (b) have such reduced claims be treated pursuant to Class 68 (Convenience Claims), receiving a projected recovery of 100% of such reduced claim. If you hold multiple Allowed CW General Unsecured Claims and ERS General Unsecured Claims, receive more than one ballot, and wish to make this election, you **must** make a consistent election on all the ballots you received for them to be treated pursuant to Class 68 (Convenience Claims). If the ballots do

EXHIBIT 2 - A

Commonwealth of Puerto Rico 1845 SRF 55668 MMLID 2236471 PackID 58-1483
Francisco Beltran et all (4,493 Plaintiffs) collectively (the Beltran Cintron Plaintiff Group")...
Attn: Ivonne Gonzalez-Morales
PO Box 9021828
San Juan PR 00902

PLEASE COMPLETE THE FOLLOWING:

Item 1. Amount of Claim

For purposes of voting to accept or reject the Plan, the undersigned holds the Claim(s) in **Class 58 (CW General Unsecured Claims)** as of the July 13, 2021 Voting Record Date as set forth below in the following aggregate amount:

\$ 1.00

To submit your election in Item 2 and vote in Item 3 below via the “E-Ballot” platform, please visit <https://cases.primeclerk.com/puertorico>. Click on the “Submit E-Ballot” section of the website and follow the instructions to submit your ballot.

IMPORTANT NOTE: You will need the following information to retrieve and submit your customized electronic Ballot:

Unique E-Ballot ID#: 170328300179883

Prime Clerk’s “E-Ballot” platform is the sole manner in which elections and votes will be accepted via electronic or online transmission. Elections submitted by facsimile, email or other means of electronic transmission will not be counted.

Each E-Ballot ID# is to be used solely for voting only those Claims described in Item 1 of your electronic Ballot. Please complete and submit an E-Ballot for each E-Ballot ID# you receive, as applicable.

Creditors who make an election or vote using Prime Clerk’s “E-Ballot” platform should NOT also submit a paper Ballot.

Item 2. Election to be Treated as Convenience Claim (Class 68).

Pursuant to the Plan, any holder of an Allowed **CW General Unsecured Claim** may elect to (a) reduce the amount of such Allowed Claim to \$20,000.00 and (b) have such reduced Claim be treated pursuant to Class 68 (Convenience Claims), receiving a projected recovery of 100% of such reduced claim.

Any holder of multiple Allowed CW General Unsecured Claims and ERS General Unsecured Claims may elect to (a) reduce the amount of such multiple Claims to an aggregate amount of \$40,000.00 and (b) have such reduced claims be treated pursuant to Class 68 (Convenience Claims), receiving a projected recovery of 100% of such reduced claim. If you hold multiple Allowed CW General Unsecured Claims and ERS General Unsecured Claims, receive more than one ballot, and wish to make this election, you **must** make a consistent election on all the ballots you received for them to be treated pursuant to Class 68 (Convenience Claims). If the ballots do

Commonwealth of Puerto Rico 1845 SRF 55668 MMLID 1418527 PackID 58-1478
MADELINE ACEVEDO CAMANCHO ET AL. (2818 PLAINTIFFS) (COLLECTIVELY THE
"ACEVEDO CAMACHO PLAINTIFF GROU
LCDA. IVONNE GONZALEZ MORALES
PO BOX 9021828
SAN JUAN PR 00902-1828

PLEASE COMPLETE THE FOLLOWING:

Item 1. Amount of Claim

For purposes of voting to accept or reject the Plan, the undersigned holds the Claim(s) in **Class 58 (CW General Unsecured Claims)** as of the July 13, 2021 Voting Record Date as set forth below in the following aggregate amount:

\$ 1.00

To submit your election in Item 2 and vote in Item 3 below via the “E-Ballot” platform, please visit <https://cases.primeclerk.com/puertorico>. Click on the “Submit E-Ballot” section of the website and follow the instructions to submit your ballot.

IMPORTANT NOTE: You will need the following information to retrieve and submit your customized electronic Ballot:

Unique E-Ballot ID#: 170328300179878

Prime Clerk’s “E-Ballot” platform is the sole manner in which elections and votes will be accepted via electronic or online transmission. Elections submitted by facsimile, email or other means of electronic transmission will not be counted.

Each E-Ballot ID# is to be used solely for voting only those Claims described in Item 1 of your electronic Ballot. Please complete and submit an E-Ballot for each E-Ballot ID# you receive, as applicable.

Creditors who make an election or vote using Prime Clerk’s “E-Ballot” platform should NOT also submit a paper Ballot.

Item 2. Election to be Treated as Convenience Claim (Class 68).

Pursuant to the Plan, any holder of an Allowed **CW General Unsecured Claim** may elect to (a) reduce the amount of such Allowed Claim to \$20,000.00 and (b) have such reduced Claim be treated pursuant to Class 68 (Convenience Claims), receiving a projected recovery of 100% of such reduced claim.

Any holder of multiple Allowed CW General Unsecured Claims and ERS General Unsecured Claims may elect to (a) reduce the amount of such multiple Claims to an aggregate amount of \$40,000.00 and (b) have such reduced claims be treated pursuant to Class 68 (Convenience Claims), receiving a projected recovery of 100% of such reduced claim. If you hold multiple Allowed CW General Unsecured Claims and ERS General Unsecured Claims, receive more than one ballot, and wish to make this election, you **must** make a consistent election on all the ballots you received for them to be treated pursuant to Class 68 (Convenience Claims). If the ballots do

Commonwealth of Puerto Rico 1845 SRF 55668 MMLID 1479872 PackID 58-0971
Abraham Giménez et al (1,046 Plaintiffs) collectively (the "Abraham Giménez Plaintiff Group"); Civi
Jorge
Abraha m G imé nez Pl ai n tiff Gr o up (1,046 Plaintiffs)
Lcda. Ivonne Gonzalez-Morales
PO Box 9021828
San Juan PR 00902-1828

PLEASE COMPLETE THE FOLLOWING:

Item 1. Amount of Claim

For purposes of voting to accept or reject the Plan, the undersigned holds the Claim(s) in **Class 58 (CW General Unsecured Claims)** as of the July 13, 2021 Voting Record Date as set forth below in the following aggregate amount:

\$ 1.00

To submit your election in Item 2 and vote in Item 3 below via the “E-Ballot” platform, please visit <https://cases.primeclerk.com/puertorico>. Click on the “Submit E-Ballot” section of the website and follow the instructions to submit your ballot.

IMPORTANT NOTE: You will need the following information to retrieve and submit your customized electronic Ballot:

Unique E-Ballot ID#: 170328300179327

Prime Clerk’s “E-Ballot” platform is the sole manner in which elections and votes will be accepted via electronic or online transmission. Elections submitted by facsimile, email or other means of electronic transmission will not be counted.

Each E-Ballot ID# is to be used solely for voting only those Claims described in Item 1 of your electronic Ballot. Please complete and submit an E-Ballot for each E-Ballot ID# you receive, as applicable.

Creditors who make an election or vote using Prime Clerk’s “E-Ballot” platform should NOT also submit a paper Ballot.

Item 2. Election to be Treated as Convenience Claim (Class 68).

Pursuant to the Plan, any holder of an Allowed CW General Unsecured Claim may elect to (a) reduce the amount of such Allowed Claim to \$20,000.00 and (b) have such reduced Claim be treated pursuant to Class 68 (Convenience Claims), receiving a projected recovery of 100% of such reduced claim.

Any holder of multiple Allowed CW General Unsecured Claims and ERS General Unsecured Claims may elect to (a) reduce the amount of such multiple Claims to an aggregate amount of \$40,000.00 and (b) have such reduced claims be treated pursuant to Class 68 (Convenience Claims), receiving a projected recovery of 100% of such reduced claim. If you hold multiple Allowed CW General Unsecured Claims and ERS General Unsecured Claims, receive more than one ballot, and wish to make this election, you **must** make a consistent election on all the ballots you received for them to be treated pursuant to Class 68 (Convenience Claims). If the ballots do

Commonwealth of Puerto Rico 1845 SRF 55668 MMLID 2236674 PackID 58-1475
Jorge Abraham Gimenez et al (1,046 Plaintiffs) Collectively (the "Abraham Gimenez Plaintiff Group")
Attn: Ivonne Gonzalez-Morales
PO Box 9021828
San Juan PR 00902

PLEASE COMPLETE THE FOLLOWING:

Item 1. Amount of Claim

For purposes of voting to accept or reject the Plan, the undersigned holds the Claim(s) in **Class 58 (CW General Unsecured Claims)** as of the July 13, 2021 Voting Record Date as set forth below in the following aggregate amount:

\$ 1.00

To submit your election in Item 2 and vote in Item 3 below via the “E-Ballot” platform, please visit <https://cases.primeclerk.com/puertorico>. Click on the “Submit E-Ballot” section of the website and follow the instructions to submit your ballot.

IMPORTANT NOTE: You will need the following information to retrieve and submit your customized electronic Ballot:

Unique E-Ballot ID#: 170328300179875

Prime Clerk’s “E-Ballot” platform is the sole manner in which elections and votes will be accepted via electronic or online transmission. Elections submitted by facsimile, email or other means of electronic transmission will not be counted.

Each E-Ballot ID# is to be used solely for voting only those Claims described in Item 1 of your electronic Ballot. Please complete and submit an E-Ballot for each E-Ballot ID# you receive, as applicable.

Creditors who make an election or vote using Prime Clerk’s “E-Ballot” platform should NOT also submit a paper Ballot.

Item 2. Election to be Treated as Convenience Claim (Class 68).

Pursuant to the Plan, any holder of an Allowed **CW General Unsecured Claim** may elect to (a) reduce the amount of such Allowed Claim to \$20,000.00 and (b) have such reduced Claim be treated pursuant to Class 68 (Convenience Claims), receiving a projected recovery of 100% of such reduced claim.

Any holder of multiple Allowed CW General Unsecured Claims and ERS General Unsecured Claims may elect to (a) reduce the amount of such multiple Claims to an aggregate amount of \$40,000.00 and (b) have such reduced claims be treated pursuant to Class 68 (Convenience Claims), receiving a projected recovery of 100% of such reduced claim. If you hold multiple Allowed CW General Unsecured Claims and ERS General Unsecured Claims, receive more than one ballot, and wish to make this election, you **must** make a consistent election on all the ballots you received for them to be treated pursuant to Class 68 (Convenience Claims). If the ballots do

Commonwealth of Puerto Rico 1845 SRF 55668 MMLID 1480232 PackID 58-1469
DELFINA LÓPEZ ROSARIO ET AL COLLECTIVELY (THE LOPEZ-ROSARIO PLAINTIFF
GROUP)
P.O. BOX 9021828
SAN JUAN PR 00902-1828

PLEASE COMPLETE THE FOLLOWING:

Item 1. **Amount of Claim**

For purposes of voting to accept or reject the Plan, the undersigned holds the Claim(s) in **Class 58 (CW General Unsecured Claims)** as of the July 13, 2021 Voting Record Date as set forth below in the following aggregate amount:

\$ 1.00

To submit your election in Item 2 and vote in Item 3 below via the “E-Ballot” platform, please visit <https://cases.primeclerk.com/puertorico>. Click on the “Submit E-Ballot” section of the website and follow the instructions to submit your ballot.

IMPORTANT NOTE: You will need the following information to retrieve and submit your customized electronic Ballot:

Unique E-Ballot ID#: 170328300179869

Prime Clerk’s “E-Ballot” platform is the sole manner in which elections and votes will be accepted via electronic or online transmission. Elections submitted by facsimile, email or other means of electronic transmission will not be counted.

Each E-Ballot ID# is to be used solely for voting only those Claims described in Item 1 of your electronic Ballot. Please complete and submit an E-Ballot for each E-Ballot ID# you receive, as applicable.

Creditors who make an election or vote using Prime Clerk’s “E-Ballot” platform should NOT also submit a paper Ballot.

Item 2. **Election to be Treated as Convenience Claim (Class 68).**

Pursuant to the Plan, any holder of an Allowed CW General Unsecured Claim may elect to (a) reduce the amount of such Allowed Claim to \$20,000.00 and (b) have such reduced Claim be treated pursuant to Class 68 (Convenience Claims), receiving a projected recovery of 100% of such reduced claim.

Any holder of multiple Allowed CW General Unsecured Claims and ERS General Unsecured Claims may elect to (a) reduce the amount of such multiple Claims to an aggregate amount of \$40,000.00 and (b) have such reduced claims be treated pursuant to Class 68 (Convenience Claims), receiving a projected recovery of 100% of such reduced claim. If you hold multiple Allowed CW General Unsecured Claims and ERS General Unsecured Claims, receive more than one ballot, and wish to make this election, you **must** make a consistent election on all the ballots you received for them to be treated pursuant to Class 68 (Convenience Claims). If the ballots do

Commonwealth of Puerto Rico 1845 SRF 55668 MMLID 1503117 PackID 58-0323
ALEJO CRUZ SANTOS et al (262 Plaintiffs) collectively (the "Cruz Santos Plaintiff Group"); CASP C
Cruz Santos Plaintiff Group (262 Plaintiffs)
Lcda. Ivonne Gonzalez-Morales
P.O. Box 9021828
San Juan PR 00902-1828

PLEASE COMPLETE THE FOLLOWING:

Item 1. Amount of Claim

For purposes of voting to accept or reject the Plan, the undersigned holds the Claim(s) in **Class 58 (CW General Unsecured Claims)** as of the July 13, 2021 Voting Record Date as set forth below in the following aggregate amount:

\$ 1.00

To submit your election in Item 2 and vote in Item 3 below via the “E-Ballot” platform, please visit <https://cases.primeclerk.com/puertorico>. Click on the “Submit E-Ballot” section of the website and follow the instructions to submit your ballot.

IMPORTANT NOTE: You will need the following information to retrieve and submit your customized electronic Ballot:

Unique E-Ballot ID#: 170328300178679

Prime Clerk’s “E-Ballot” platform is the sole manner in which elections and votes will be accepted via electronic or online transmission. Elections submitted by facsimile, email or other means of electronic transmission will not be counted.

Each E-Ballot ID# is to be used solely for voting only those Claims described in Item 1 of your electronic Ballot. Please complete and submit an E-Ballot for each E-Ballot ID# you receive, as applicable.

Creditors who make an election or vote using Prime Clerk’s “E-Ballot” platform should NOT also submit a paper Ballot.

Item 2. Election to be Treated as Convenience Claim (Class 68).

Pursuant to the Plan, any holder of an Allowed CW General Unsecured Claim may elect to (a) reduce the amount of such Allowed Claim to \$20,000.00 and (b) have such reduced Claim be treated pursuant to Class 68 (Convenience Claims), receiving a projected recovery of 100% of such reduced claim.

Any holder of multiple Allowed CW General Unsecured Claims and ERS General Unsecured Claims may elect to (a) reduce the amount of such multiple Claims to an aggregate amount of \$40,000.00 and (b) have such reduced claims be treated pursuant to Class 68 (Convenience Claims), receiving a projected recovery of 100% of such reduced claim. If you hold multiple Allowed CW General Unsecured Claims and ERS General Unsecured Claims, receive more than one ballot, and wish to make this election, you **must** make a consistent election on all the ballots you received for them to be treated pursuant to Class 68 (Convenience Claims). If the ballots do

Commonwealth of Puerto Rico 1845 SRF 55668 MMLID 1653588 PackID 58-1472
Prudencio Acevedo Arocho et al (1,379 Plaintiffs) collectively (the "Acevedo-Arocho Plaintiff Group")
Ivonne Gonzalez-Morales
P.O. Box 9021828
San Juan PR 00902-1828

PLEASE COMPLETE THE FOLLOWING:

Item 1. Amount of Claim

For purposes of voting to accept or reject the Plan, the undersigned holds the Claim(s) in **Class 58 (CW General Unsecured Claims)** as of the July 13, 2021 Voting Record Date as set forth below in the following aggregate amount:

\$ 1.00

To submit your election in Item 2 and vote in Item 3 below via the “E-Ballot” platform, please visit <https://cases.primeclerk.com/puertorico>. Click on the “Submit E-Ballot” section of the website and follow the instructions to submit your ballot.

IMPORTANT NOTE: You will need the following information to retrieve and submit your customized electronic Ballot:

Unique E-Ballot ID#: 170328300179872

Prime Clerk’s “E-Ballot” platform is the sole manner in which elections and votes will be accepted via electronic or online transmission. Elections submitted by facsimile, email or other means of electronic transmission will not be counted.

Each E-Ballot ID# is to be used solely for voting only those Claims described in Item 1 of your electronic Ballot. Please complete and submit an E-Ballot for each E-Ballot ID# you receive, as applicable.

Creditors who make an election or vote using Prime Clerk’s “E-Ballot” platform should NOT also submit a paper Ballot.

Item 2. Election to be Treated as Convenience Claim (Class 68).

Pursuant to the Plan, any holder of an Allowed CW General Unsecured Claim may elect to (a) reduce the amount of such Allowed Claim to \$20,000.00 and (b) have such reduced Claim be treated pursuant to Class 68 (Convenience Claims), receiving a projected recovery of 100% of such reduced claim.

Any holder of multiple Allowed CW General Unsecured Claims and ERS General Unsecured Claims may elect to (a) reduce the amount of such multiple Claims to an aggregate amount of \$40,000.00 and (b) have such reduced claims be treated pursuant to Class 68 (Convenience Claims), receiving a projected recovery of 100% of such reduced claim. If you hold multiple Allowed CW General Unsecured Claims and ERS General Unsecured Claims, receive more than one ballot, and wish to make this election, you **must** make a consistent election on all the ballots you received for them to be treated pursuant to Class 68 (Convenience Claims). If the ballots do

EXHIBIT 2 - B

Three Hundred and Seventy-Fifth Omnibus Objection

Exhibit A - Claims to Be Disallowed

CLAIMS TO BE DISALLOWEDREMAINING CLAIMS

NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
262 RODRIGUEZ MAIZAN, MARGARITA URB. LEVITTOWN CALLE MARIANO ABRIL EU-17 TOA BAJA, PR 00949	06/23/21	17 BK 03283-LTS / Commonwealth of Puerto Rico	179434^	\$ 70,000.00*	MADLINE ACEVEDO CAMACHO ET AL. (2,818 PLAINTIFFS) (COLLECTIVELY THE "ACEVEDO CAMACHO PLAINTIFF GROUP"); CASP CASE NUM. 2016-05-1340 PO BOX 9021828 SAN JUAN, PR 00902-1828	06/29/18	17 BK 03566-LTS / Employees Retirement System of the Government of the Commonwealth of Puerto Rico	103072^	\$ 8,990,000.00
					MADLINE ACEVEDO CAMACHO ET AL. (2818 PLAINTIFFS) (COLLECTIVELY THE "ACEVEDO CAMACHO PLAINTIFF GROUP"); CASP CASE NUM. 2016-05-1340 LCDA. IVONNE GONZALEZ MORALES PO BOX 9021828 SAN JUAN, PR 00902-1828	06/04/18	17 BK 03283-LTS / Commonwealth of Puerto Rico	32044	\$ 50,000,000.00

Reason: This claim is duplicative of Master Claim nos. 32044 and 103072, which were filed on behalf of all plaintiffs in the litigation captioned Madeline Acevedo Camacho et al. v. Puerto Rico Department of Family Affairs, No. 2016-05-1340 (the "Acevedo Camacho Master Claims"), by the attorney representing plaintiffs in that litigation. The Acevedo Camacho Master Claims are filed on behalf of the DOFA employees who alleged that DOFA illegally sequestered wages and pension payments as a result of the Office of Public Service Personnel's "General Memorandum No. 5-86." Claimant is a plaintiff in that litigation, and his/her claim asserts the above-referenced litigation and/or liabilities associated with this litigation as its basis.

^ Claim #179434 also contained on Exhibit A to the 374th Omnibus Claims Objection for Claims to Be Disallowed
Claim #103072 also contained on Exhibit A to the 337th Omnibus Claims Objection for Misclassified Claims

Exhibit A - Claims to Be Disallowed

CLAIMS TO BE DISALLOWEDREMAINING CLAIMS

NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
263 RODRIGUEZ MALDONADO, IVETTE M. CIUDAD JARDIN BOX 290 CANÓVANAS, PR 00729	06/25/18	17 BK 03283-LTS / Commonwealth of Puerto Rico	93430^	\$ 72,000.00*	FRANCISCO BELTRAN ET ALL (4,493 PLAINTIFFS) COLLECTIVELY (THE BELTRAN CINTRON PLAINTIFF GROUP)... ATTN: IVONNE GONZALEZ-MORALES PO BOX 9021828 SAN JUAN, PR 00902	03/05/21	17 BK 03283-LTS / Commonwealth of Puerto Rico	179140	\$ 105,000,000.00
					FRANCISCO BELTRAN ET AL (4,593 PLAINTIFFS) COLLECTIVELY (THE "BELTRAN CINTRON PLAINTIFF GROUP") CIVIL CASE NUM. K AC2009-0805/TSPR AC 2016-0120 C/O IVONNE GONZALEZ-MORALES ATTORNEY FOR BELTRAN CINTRON PLAINTIFF GROUP P.O. BOX 9021828 SAN JUAN, PR 00902-1828	06/29/18	17 BK 03566-LTS / Employees Retirement System of the Government of the Commonwealth of Puerto Rico	93199^	\$ 15,283,000.00

Reason: This claim is duplicative of Master Claim nos. 179140 and 93199, which were filed on behalf of all plaintiffs in the litigation captioned Francisco Beltrán Cintrón et al. v. Puerto Rico Department Family Affairs, No. KAC2009-0809 (the "Beltrán Cintrón Master Claims"), by the attorney representing plaintiffs in that litigation. The plaintiffs in the litigation are former Department of Family Affairs ("DOFA") employees who alleged that DOFA withheld wages and pension payments as a result of the Office of Public Service Personnel's "General Memorandum No. 5-86." Claimant is a plaintiff in the litigation, and his/her claim asserts the above-referenced litigation and/or liabilities associated with this litigation as its basis.

^ Claim #93430 also contained on Exhibit A to the 377th Omnibus Claims Objection for Claims to Be Disallowed

Claim #93199 also contained on Exhibit A to the 337th Omnibus Claims Objection for Misclassified Claims

CLAIMS TO BE DISALLOWEDREMAINING CLAIMS

NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
265 RODRIGUEZ MONTALVO, NOEL URB. ALTURAS SABANERAS CALLE E92 SABANA GRANDE, PR 00637	04/25/18	17 BK 03283-LTS / Commonwealth of Puerto Rico	8803^	Undetermined*	ABRAHAM GIMÉNEZ ET AL (1,046 PLAINTIFFS) COLLECTIVELY (THE "ABRAHAM GIMÉNEZ PLAINTIFF GROUP"); CIVIL CASE NUM. K AC2013-1019 / TSPR AC 2016-0120, JORGE ABRAHAM GIMÉNEZ PLAINTIFF GROUP (1,046 PLAINTIFFS) LCDA. IVONNE GONZALEZ-MORALES PO BOX 9021828 SAN JUAN, PR 00902-1828	06/29/18	17 BK 03566-LTS / Employees Retirement System of the Government of the Commonwealth of Puerto Rico	130077^	\$ 6,293,000.
					JORGE ABRAHAM GIMENEZ ET AL (1,046 PLAINTIFFS) COLLECTIVELY (THE "ABRAHAM GIMENEZ PLAINTIFF GROUP") ATTN: IVONNE GONZALEZ-MORALES PO BOX 9021828 SAN JUAN, PR 00902	03/05/21	17 BK 03283-LTS / Commonwealth of Puerto Rico	179141	\$ 35,000,000.0

Reason: This claim is duplicative of Master Claim nos. 179141 and 130077, which were filed on behalf of all plaintiffs in the litigation captioned Abraham Gimenez et al. v. Puerto Rico Department of Transportation & Public Works, No. KAC2013-1019 (the "Abraham Gimenez Master Claims"), by the attorney representing plaintiffs in that litigation. The plaintiffs in the litigation are former Department of Transportation and Public Works ("DOTP") employees who alleged that DOTP withheld wages and pension payments as a result of the Office of Public Service Personnel's "General Memorandum No. -86." Claimant is a plaintiff in that litigation, and his/her claim asserts the above-referenced litigation and/or liabilities associated with this litigation as its basis.

^ Claim #8803 also contained on Exhibit A to the 351st Omnibus Claims Objection for Partially Duplicative Claims

Claim #8803 also contained on Exhibit A to the 378th Omnibus Claims Objection for Claims to Be Disallowed

Claim #130077 also contained on Exhibit A to the 337th Omnibus Claims Objection for Misclassified Claims